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Community College District; Michelle
Nieuwenhuis, Alex Carranza, Amy Montano,
and David Rucker

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Carlos Carrillo, an adult individual,

Plaintiff,

v.

Pima County Community College
District; Michelle Nieuwenhuis, an adult
individual; Alex Carranza, an adult
individual; Amy Montano, an adult
individual; David Rucker, an adult
individual,

Defendants.

No. 22CV00359-TUC-JAS

**Stipulation to Extend Rule 16
Scheduling Order Deadlines**

**(Assigned to the Honorable James A.
Soto)**

The parties, by and through their respective undersigned counsel, hereby submit this Stipulation to Extend Rule 16 Scheduling Order Deadlines. The parties affirm that this request is made in good faith and not for the purpose of delay. The parties have exchanged extensive written discovery and to date depositions of the Plaintiff and Defendants Cpl. Carranza and Sgt. Montano have been taken. The parties are currently working cooperatively to schedule any remaining necessary fact witness depositions.

The parties request that the current deadlines be extended as set forth below. This will allow for the mediation to take place before the parties are required to retain experts and disclose reports.

When dates were initially set the parties agreed to set a mediation date before experts needed to be retained. When this matter was referred to Magistrate Judge Jacqueline M. Rateau for mediation she was not available until August 7, 2023. (Doc 33). On June 20, 2023 the parties received notice that the matter had been transferred to Magistrate Judge Thomas Ferraro. (Doc. 41). Because Judge Ferraro was not available on August 7th the parties were requested to provide alternative dates. Given undersigned counsels' trial schedule and travel plans, the first date that counsel and Judge Ferraro were available is September 11, 2023. The mediation is now set to begin on that date at 9:30 a.m.

Based on the foregoing, the parties request that the Scheduling Order be amended as follows:

EVENT	CURRENT DEADLINE	NEW DEADLINE
Fact Discovery	July 28, 2023	August 30, 2023
Plaintiff's Expert Disclosure	August 25, 2023	September 29, 2023
Defendant's Expert Disclosure	September 29, 2023	November 3, 2023
Rebuttal Expert Disclosures	October 27, 2023	December 29, 2023
Expert Depositions	December 1, 2023	January 26, 2024
Dispositive Motions	January 25, 2024	March 1, 2024

Accordingly, for the foregoing reasons the parties believe good cause exists and respectfully request that the case discovery and other deadlines be adjusted as set forth above.

1 DATED this 10th day of July, 2023.

2 JONES, SKELTON & HOCHULI, P.L.C.

3
4 By /s/ Georgia A. Staton

5 Georgia A. Staton

6 Ravi V. Patel

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Community College District; Michelle

8 Nieuwenhuis, Alex Carranza, Amy

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9 MICK LEVIN, P.L.C.

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11
12 By /s/ Mick Levin (with permission)

13 Mick Levin, Esq.

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14 Phoenix, Arizona 85018

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of July, 2023, I caused the foregoing document to be filed electronically with the Clerk of Court through the CM/ECF System for filing; and served on counsel of record via the Court's CM/ECF system.

/s/ Cecily N. Benson